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Reply to the Staunton office

April 15, 2019

VIA ECF FILING

Susan Moody, Deputy Clerk
United States District Court
Office of the Clerk
210 Franklin Road, SW, Room 540
Roanoke, Virginia 24011

Re: Ira D. Socol v. Albemarle County School Board and Dr. Matthew Haas
United States District Court for the Western District of Virginia
Civil Action No.: 3:18cv0090

Dear Ms. Moody:

I am writing in response to your letter regarding trial dates in the above-referenced matter.

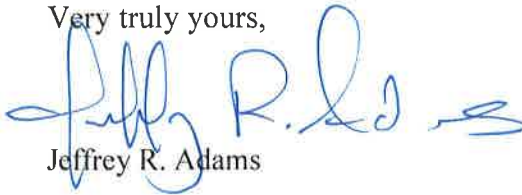
Any of the trial dates you have suggested are convenient for the plaintiff. However, we would request that one of the later trial dates—February 24th or later—be selected by the Court. Our reason for requesting a later date relates to discovery in this matter. Specifically, there will be significant discovery to undertake in the matter, including discovery of numerous text messages and emails that will need to be completed prior to the taking of depositions. Moreover, the Court has not ruled on the Defendants' Motion to Dismiss yet, and such discovery cannot commence until the Court has issued its ruling and the Defendants have answered the complaint.

Setting the trial date relatively late also may facilitate the use of alternate dispute resolution in the matter. Specifically, it will ensure that the parties have sufficient time to engage in mediation prior to the conclusion of discovery, with the confidence that if an amicable resolution is not reached, there will be sufficient time to complete discovery and litigate the matter.

Thank you, and thanks to the Court, for your consideration in this matter.

Susan Moody
April 15, 2019
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Very truly yours,



Jeffrey R. Adams

JRA/pr
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cc: Ira D. Socol (*via email*)
Jennifer Royer, Esq. (*via ECF filing*)